

KEMP & KEMP
ATTORNEYS AT LAW
7435 W. Azure Drive, Suite 110
LAS VEGAS, NEVADA 89130
Tel. (702) 258-1183 ♦ Fax (702) 258-6983

JAMES P. KEMP, ESQ.
Nevada Bar No.: 6375
VICTORIA L. NEAL, ESQ.
Nevada Bar No.: 13382
KEMP & KEMP
7435 W. Azure Drive, Suite 110
Las Vegas, NV 89130
702-258-1183 ph /702-258-6983 fax
jp@kemp-attorneys.com
vneal@kemp-attorneys.com

Attorneys for Plaintiff
ZEZY FARFAN

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ZEZY R. FARFAN; and ZEZY R.
FARFAN, BY AND THROUGH HER
GUARDIAN ELIZABETH V. ALVA;

Plaintiff

vs.

STATION CASINOS, LLC, a Nevada
Limited Liability Company; NP RED ROCK,
LLC, d/b/a RED ROCK CASINO, RESORT
AND SPA, a Nevada Limited Liability
Company; ROE Business Organizations I-X;
and DOE INDIVIDUALS I-X, Inclusive,

Defendants

Case No.: 2:20-cv-01516-CDS-NJK

**STIPULATION AND ORDER TO
EXTEND SUMMARY JUDGMENT
BRIEFING SCHEDULE**

[THIRD REQUEST]

Plaintiff ZEZY FARFAN and Defendant STATION CASINOS, LLC and NP RED ROCK, LLC, d/b/a RED ROCK CASINO, RESORT AND SPA, by and through their undersigned counsel, hereby submit this Stipulation and Order to Extend Summary Judgment Briefing Schedule. Defendant have filed a summary judgment motion. (ECF No. 38). The current deadline for Plaintiff to respond is January 9, 2023. The new requested date is **Monday, January 23, 2023**. This request is made in good

1 faith, is not made to cause delay, is submitted pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, and
2 is the parties' second request. As demonstrated below, good cause exists for the parties' request:

3 1. The need for the extension arises from the sudden and unexpected disability of Plaintiff's
4 attorney Victoria L. Neal, Esq. The parties have kept the Court informed as to Ms. Neal's
5 progress and it was anticipated the medical procedure she had on November 21, 2022, would
6 allow her to resume her regular daily activities to include increasing her workload; however, that
7 was not case.

8 2. On December 16, 2022, it was determined the November procedure had failed. Since that
9 time, Ms. Neal has been undergoing further evaluation and testing for surgery. She remains
10 on medical leave and still only able to work on a part-time basis.

11 3. It is anticipated that no further extensions of time will be necessary to complete Plaintiff's
12 Opposition.

13 ****REMAINDER OF PAGE INTENTIONALLY LEFT BLANK****
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KEMP & KEMP

ATTORNEYS AT LAW

7435 W. Azure Drive, Suite 110

LAS VEGAS, NEVADA 89130

Tel. (702) 258-1183 • Fax (702) 258-6983

1 In consideration of the above, the parties submit that good cause exists to extend
2 the deadline for Plaintiff to respond to Defendants' motion for summary judgment.

3
4 Dated: January 5, 2023

Dated: January 5, 2023

5 Respectfully submitted,

Respectfully submitted,

6 /s/ Victoria L. Neal

/s/ Scott M. Mahoney

7 JAMES P. KEMP, ESQ., NV Bar #6375
8 VICTORIA L. NEAL, ESQ., NV Bar 13382
KEMP & KEMP

SCOTT M. MAHONEY, ESQ., NV Bar #1099
FISHER & PHILLIPS, LLP
300 S. FOURTH STREET, SUITE 1500
LAS VEGAS, NEVADA 89101

9 Attorneys for Plaintiff
Zezy Farfan

Attorneys for Defendants
Station Casinos, LLC and NP Red Rock Casino
LLC, d/b/a Red Rock Casino Resort and Spa

11
12 **IT IS SO ORDERED.**

13
14
15 
16 CRISTINA D. SILVA
17 UNITED STATES DISTRICT JUDGE

18 DATED: January 6, 2023
19
20
21
22
23
24
25
26
27
28

KEMP & KEMP

ATTORNEYS AT LAW

7435 W. Azure Drive, Suite 110

LAS VEGAS, NEVADA 89130

Tel. (702) 258-1183 ♦ Fax (702) 258-6983